

Approved by: \_\_\_\_\_

HAMZAH KHAN

Special Assistant United States Attorney

Before: THE HONORABLE KIM P. BERG  
United States Magistrate Judge  
Southern District of New York

22 MAG 9708(KPB)

-----x  
UNITED STATES OF AMERICA :

MISDEMEANOR  
COMPLAINT

-v-

Violation of

JULIA L. ANDERSON :

NYVTL 511(1)(a)  
NYVTL 1200(d)

Defendant :

COUNTY OF OFFENSE:  
ORANGE

-----x  
SOUTHERN DISTRICT OF NEW YORK, ss.:

KAYLEE CLAYBROOK, being duly sworn, deposes and says that she is a Court Liaison assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE

On or about June 28, 2022, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, JULIA L. ANDERSON, the defendant, unlawfully, knowingly and willfully operated a motor vehicle upon a public road while knowing, or having reason to know, that her license to operate such motor vehicle in New York was suspended, revoked, or otherwise withdrawn by the commissioner, to wit, the defendant was observed operating her motor vehicle at Stony Lonesome Gate and an investigation revealed that the defendant's state driver's license had been suspended.

(New York Vehicle and Traffic Law, Section 511(1)(a))

COUNT TWO

On or about October 26, 2022, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States,

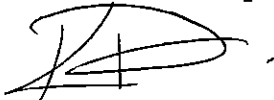
in the Southern District of New York, JULIA L. ANDERSON, the defendant, unlawfully, knowingly and willfully parked her vehicle along a roadway with signs having been posted restricting parking to CPA Pass holders only, to wit: the defendant's vehicle was observed parked along Howard Road without a CPA pass displayed on the vehicle.

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. On or about June 28, 2022 at approximately 10:02 a.m., MP Officer, SPC Uddin, was conducting Random Antiterrorism Measures at Stony Lonesome Gate. A black Mazda CX-5 being operated by the defendant was selected for a check. Upon checking the defendant's driver's license, it came back suspended.
3. The defendant was issued a District Court Violation Notice for operating a motor vehicle while license suspended or revoked (DCVN number E1489107/SY10) and was released on her own recognizance.
4. On or about October 26, 2022 at approximately 12:10 p.m., MP Officer, SPC Craggette, was conducting parking enforcement along Howard Road, West Point, New York. This area is restricted to CPA pass holders only. He observed a Mazda CX-5 registered to the defendant parked along Howard Road and no CPA sticker visible.

5. The defendant was issued a District Court Violation Notice for stopped, standing, or parking where prohibited (official posted sign) (DCVN 6687739/SY10).

**WHEREFORE**, deponent prays that the above defendant be imprisoned or bailed, as the case may be.



---

KAYLEE CLAYBROOK  
Court Liaison

Sworn to before me this  
2nd day of December, 2022



---

HONORABLE KIM P. BERG  
United States Magistrate Judge  
Southern District of New York